

EXHIBIT “M”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TERESA MCCOY,

Plaintiff,

-against-

THE TJX COMPANIES, INC.,

Defendant.

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Civil Action No.:
21-cv-04907

INITIAL DISCLOSURE
PURSUANT TO RULE
26(a)(1)

Defendant THE TJX COMPANIES, INC. ("TJX"), by its attorneys, Simmons Jannace DeLuca, LLP, as and for its Initial Disclosure pursuant to Federal Rule of Civil Procedure 26(a)(1) hereby states as follows:

1. The name, address and telephone number of individuals likely to have discoverable information that the undersigned intends to use to support its defenses are as follows:

Response: TJX employees Joseph Baglivio and Arturo Cepeda, C/O Simmons Jannace DeLuca LLP, 43 Corporate Drive, Hauppauge, NY 11788. A search is currently being conducted for any additional individuals likely to have discoverable information and defendant reserves the right to supplement this response.

2. Copies of documents, etc., in the defendant's possession, custody or control that defendant intends to use to support of its defenses:

Response: Annexed hereto as Exhibit "A" is a copy of the

typed TJX Accident Report pertaining to the incident.

3. Computation of damages claimed by defendant are as follows:

Response: Defendant is not claiming to have incurred any damages as a result of the accident alleged other than litigation expenses, attorneys' fees, costs and disbursements resulting from the defense of this case.

4. Defendant's insurance information is as follows:

Response: Defendant was insured by Zurich North America Insurance with policy limits of \$2,000,000.00 per occurrence.

5. Defendant reserves its right to supplement and/or amend its response as information is obtained.

Dated: Hauppauge, New York
July 28, 2021

Simmons Jannace DeLuca, LLP

BY: 

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